

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT et al.,

Defendants.

Civil Action No. 3:21-cv-00259  
(Lead Case)

FAIR MAPS TEXAS ACTION COMMITTEE,  
et al.,

Plaintiffs,

v.

GREG ABBOTT et al.,

Defendants.

Civil Action No. 3:21-cv-01038  
(Consolidated case)

**FAIR MAPS PLAINTIFFS' NOTICE OF DESIGNATION OF REBUTTAL EXPERTS**

Pursuant to the Court's June 9, 2022 Modifying Scheduling Order, ECF No. 325, Plaintiffs Fair Maps Texas Action Committee, OCA-Greater Houston, Emgage, Khanay Turner, Angela Rainey, Austin Ruiz, Aya Eneli, Sofia Sheikh, Niloufar Hafizi, Lakshmi Ramakrishnan, Amatullah Contractor, Deborah Chen, Arthur Resa, Sumita Ghosh, Anand Krishnaswamy, Peter Johnson, Zahra Syed, Chandrashekhar Benakatti, Dona Murphey, Chetan Reddy, Sankar Muthukrishnan, Christina Lu, Jason Zhang, Chris Leal, Ashley Washington, and Sarika Maheshwari (collectively, "Fair Maps Plaintiffs"), through their undersigned counsel, hereby designate the following rebuttal experts in this case:

**I. Retained Rebuttal Expert Witnesses**

1. Loren Collingwood, PhD.  
Associate Professor of Political Science at the University of New Mexico  
1 University of New Mexico  
Albuquerque, NM 87131  
lcollingwood@unm.edu  
Dr. Collingwood will testify regarding his rebuttal report and materials served under separate cover on July 27, 2022.
2. Doug Spencer, PhD.  
Associate Professor of Law at the University of Colorado, Boulder.  
Wolf Law Building, 401 UCB  
2450 Kitteredge Loop Road  
Boulder, CO 80309  
douglas.spencer@colorado.edu  
Dr. Spencer will testify regarding his rebuttal report served under separate cover on July 27, 2022.
3. Anthony “Tony” Fairfax  
CEO & Principal Consultant, CensusChannel LLC  
16 Castle Haven Road  
Hampton, VA 23666  
fairfax@censuschannel.com  
Mr. Fairfax will testify regarding his rebuttal report to be served under separate cover at a later date agreed to by the parties.

**II. Non-Retained Rebuttal Expert Witnesses**

Fair Maps Plaintiffs specifically give notice that they intend to rely on the expert testimony of other Plaintiffs groups, which includes rebuttal experts. To streamline trial presentation and not present overly duplicative testimony, Fair Maps Plaintiffs will rely on rebuttal expert opinions given by other Plaintiffs and their counsel. The designation of experts, rebuttal experts, corresponding reports, and expert disclosures served by other Plaintiffs are incorporated herein for all purposes. Fair Maps Plaintiffs make this designation without conceding the qualifications, reliability, relevancy, or admissibility of such witness’ opinions.

Date: July 27, 2022

Respectfully submitted,

*/s/ Noor Taj*

Noor Taj\*  
P.A. State Bar No. 309594  
Allison J. Riggs\*  
N.C. State Bar No. 40028  
Hilary Harris Klein  
N.C. State Bar No. 53711  
Mitchell Brown\*  
N.C. State Bar No. 56122  
Katelin Kaiser\*  
N.C. State Bar No. 56799  
SOUTHERN COALITION FOR SOCIAL JUSTICE  
1415 West Highway 54, Suite 101  
Durham, NC 27707  
Telephone: 919-323-3380  
Fax: 919-323-3942  
Allison@southerncoalition.org  
Noor@scsj.org  
hilaryhklein@scsj.org  
mitchellbrown@scsj.org  
katelin@scsj.org

David A. Donatti  
TX Bar No. 24097612  
Ashley Harris  
Texas Bar No. 24078344  
Thomas Buser-Clancy  
Texas Bar No. 24123238  
Andre I. Segura  
Texas Bar No. 24107112  
ACLU FOUNDATION OF TEXAS, INC.  
P.O. Box 8306  
Houston, TX 77288  
Tel. (713) 942-8146 Fax. (713) 942-8966  
ddonnati@aclutx.org  
aharris@aclutx.org  
tbuser-clancy@aclutx.org  
asegura@aclutx.org

Jerry Vattamala\*  
N.Y. State Bar No. 4426458  
Susana Lorenzo-Giguere\*  
N.Y. State Bar No. 2428688  
Patrick Stegemoeller\*

N.Y. State Bar No. 5819982  
ASIAN AMERICAN LEGAL DEFENSE AND  
EDUCATION FUND  
99 Hudson Street, 12th Floor  
New York, NY 10013  
jvattamala@aaldef.org  
slorenzo-giguere@aaldef.org  
pstegemoeller@aaldef.org

Yurij Rudensky\*  
N.Y. State Bar No. 5798210  
BRENNAN CENTER FOR JUSTICE AT NYU  
SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
rudenskyy@brennan.law.nyu.edu

*\*Admitted pro hac vice*

*ATTORNEYS FOR FAIR MAPS PLAINTIFFS*

**CERTIFICATE OF SERVICE**

I certify that on July 27, 2022, the foregoing Notice of Designation of Rebuttal Experts was sent by email to Counsel of record for Plaintiffs, Defendants, and Plaintiffs-Intervenors.

*/s/ Noor Taj*  
Noor Taj